

ATTACHMENT A

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS
TYLER DIVISION**

Cheetah Omni LLC,

Plaintiff,

vs.

Alcatel-Lucent USA Inc., et al.

Defendants.

HONORABLE LEONARD DAVIS

Case No. 6:11CV390

JURY TRIAL DEMANDED

**CHEETAH'S AMENDED IDENTIFICATION OF
TRIAL WITNESSES**

Pursuant to the Court's Docket Control Order, Plaintiff, Cheetah Omni L.L.C. may call the following witnesses at trial. Cheetah makes no representation that each or any of the witnesses on this list will attend the trial. Cheetah makes no representation that the witnesses will provide live testimony as opposed to deposition testimony. Cheetah reserves the right to call at trial any witness who appears on defendants' witness lists. Cheetah includes in this list individuals who may be listed on defendants' Witness Lists and Rebuttal Witness Lists without prejudice to its right to object to defendants' presentation of those witnesses at trial, the admissibility of those witnesses' testimony, or its right to move for the exclusion of those witnesses' testimony.

Cheetah reserves the right to provide a list of rebuttal witnesses at a later time pursuant to the Court's Docket Control Order.

WITNESS	(A) WILL CALL	(B) MAY CALL	(C) MAY, BUT PROBABLY WILL NOT CALL
Dr. Mohammed Islam, Cheetah, Background, history of Cheetah and related companies, contacts with Defendants, background and history of patents-in-suit	✓		
Dr. Michael Lebby, expert, infringement	✓		
James Nawrocki, expert, damages	✓		
Yajun Wang, Tellabs, architecture and functionality of Tellabs ROADM products, supplier sourcing of components used in Tellabs ROADM products		✓	
Kenneth Noreen, Tellabs, sales and accounting information regarding Tellabs optical products			✓
Robert Risdan, Tellabs, sales and accounting information regarding Tellabs optical products			✓
Renato Cavour, Tellabs, testing of Tellabs ROADM products		✓	
Brian Nagle, Tellabs, marketing, optical products and licensing			✓
Jack Kelly, CoAdna, architecture and functionality of CoAdna WSSs		✓	
James Harlan, Xterra, licensing and business relationships between Xterra and Cheetah Omni			✓
Dr. Erich Ippen, expert, validity		✓	
Thomas Strasser, Nistica		✓	

Respectfully submitted,

BROOKS KUSHMAN P.C.

Dated: 1/16/2014

By: /s/ Thomas A. Lewry

Thomas A. Lewry (MI Bar No. P36399)

(Lead Attorney)

John S. Le Roy (MI Bar No. P61964)

Robert C.J. Tuttle (MI Bar No. P25222)
John M. Halan (MI Bar No. P37616)
Christopher C. Smith (MI Bar No. P73936)
Brooks Kushman P.C.
1000 Town Center, 22nd Floor
Southfield, Michigan 48075-1238
Tel: (248) 358-4400 – Fax: (248) 358-3351
Email: tlewry@brookskushman.com
jleroy@brookskushman.com
rtuttle@brookskushman.com
jhalan@brookskushman.com
csmith@brookskushman.com

T. John Ward, Jr. (TX State Bar No. 00794818)
Jack Wesley Hill
Ward & Smith Law Firm
1127 Judson Road, Suite 220
PO Box 1231
Longview, Texas 75606
Tel: (903) 757-6400 – Fax: (903) 757-2323
Email: jw@jwfirm.com
wh@jwfirm.com

Eric Miller Albritton
Albritton Law Firm
PO Box 2649
111 West Tyler, 75601
Longview, TX 75606
Tel: (903) 757-8449 – Fax: (903) 758-7397
ema@emafirm.com

Attorneys for Plaintiff